INTERMOUNTAIN POWER SERVICE CORPORATION

RECEIVED

March 20, 2008

MAR 2 4 2008 UTAH DIVISION OF

SOLID & HAZARDOUS WASTE

Mr. Dennis R. Downs, Director Division of Solid and Hazardous Waste 288 North 1460 West P.O. Box 144880 Salt Lake City, UT 84114-4880

Reference: 2008 Annual Solid Waste Report for 2007

Dear Mr. Downs:

Attached are two Solid Waste Landfill Annual Report Forms. One for the Sanitary Landfill, the other for the Combustion By-Products Landfill. These landfills are covered under the same permit (Approval # 9103R3).

Both landfills at Intermountain Power Service Corporation are classified as Class IIIb by the Division of Solid and Hazardous Waste. Our Financial Assurance program was established with the State in April 2000. Intermountain Power Service Corporation has posted a certificate of deposit with the Utah Public Treasurers Investment Fund to cover reclamation costs and post closure costs for the Sanitary Landfill. Since this certificate earns interest, the existing money in the certificate will cover any increase in reclamation costs.

A copy of the certificate of deposit and an estimate of reclamation costs for both the Sanitary and Combustion By-Products landfills are attached. The cost to reclaim the landfills has been increased by the inflation rate of 4.01 percent over last year's estimate. The documentation from the Intermountain Power Agency (IPA), Independent Auditors' Report, which supports the funding level of the restricted assets is also attached.

As owner of the Intermountain Power Generating Facility, IPA, is responsible for the financing of expenditures associated with the operation of the Generating Station. This includes management of the Combustion By-Products Landfill. The expense for closure and post-closure care for this landfill would be financed from participant and facility operating revenue. If needed, funds may also be made available from a structured self-insurance program, which has present funding at approximately \$7,662,000. Additionally, a reserve and contingency fund, which is funded at \$40,204,000 may be used for this purpose.

Personnel who work at the landfills are referred to as Fuel Equipment Operators (FEO's). FEO's are required to take basic safety and training classes that relate to their job. In addition, laborers pick up trash from local waste receptacles and take the trash to dumpsters. The FEO's haul the dumpsters to the landfill, dump and cover the trash. Both the laborers and the FEO's are required to take training classes related to their job. A list of these classes is attached. All FEO's were current with the training requirements through the 2007 year. Both of

Mr. Dennis R. Downs March 20, 2008 Page 2

these groups are given a specific class pertaining to the landfills. This class covers operation and regulations governing the operation of both landfills. An outline of the class is attached in the training section of the annual report.

If you have questions or need further assistance, contact Mr. Wes J. Bloomfield, Superintendent of Technical Services at (435) 864-6401

Sincerely,

Large N. Cross
George W. Cross

President and Chief Operations Officer

RAW/BP:jmj Attachments

cc: Nick C. Kezman

Blaine Ipson

Van Beckstrom (w/attachments)
Jim Hewlett (IPA) (w/attachments)

Mail to: Dennis R. Downs, Director Division of Solid and Hazardous Waste P.O. Box 144880 Salt Lake City, Utah 84114-4880



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SOLID WASTE LANDFILL ANNUAL REPORTLID & HAZARDOUS WASTE For Calendar year 2007 or most recent fiscal year 00.0145

Administrat	ive Information (Please ente	er all the information rec	quested below - type	or print legibly)		
	ity Name: Intermountain G					
Facil	ity Mailing Address: 850 V					
	City: Delta	(Number & Street, Box and/o	Zip Code:	84624		
	County: Millard			0.1021		_
	•					
<u>Own</u>						
	Name: Intermountain Po			938-1333	· · · · ·	
	Mailing Address: 10653	South River Front Pa (Number & Street, Box and/o				
		State: Utah		84095		
	Contact's Name: James					
	Contact's Mailing Addre					
	Phone No.: (801) 938-1	Contact's Em	nail Address: <u>jim(</u>	@ipa.com		
0	antan (O. I. d. d. d. d.	10.1				
Oper	ator (Complete this section only Name: Intermountain Po	-				
	Mailing Address: 850 V			1 804-4414		
		(Number & Street, Box and/o				
		State: Utah				
	Contact's Name: Ron \					
	Contact's Mailing Address Phone No.: (435) 864-6					
	Findic No (433) 604-0	5495 Contact 8 En	iaii Addiessioii-	w@ipsc.com		
Facility Typ	e and Status					
	□ Class I	☑ Class IIIb	□ Class V			
		□ Class IVa	☐ Class VI			
		□ Class IVb				
C/D c	ell not operated under a separate p	permit number. Yes	□ No 🛛			
If faci	lity was permanently closed during	g the year enter date closed	i: <u>N/A</u>	· · · · · · · · · · · · · · · · · · ·		
Annual Disp	oosal					
Tota	l tons received at facility for	r disnosal:				
Waste Type		Waste Origin	Total		Measu	rement
• •	In-State	Out-of-State			Tons	Cubic
		277	27/4		_	Yards
Municipal	N/A	N/A	N/A			
Industrial	991.6	N/A	991.6			×
maasti idi					_	
C/D ¹	N/A	N/A	N/A			
'C/D v	vaste includes all waste going to a Cla	ss IV of VI landfill cell				

Conversion Factor Used							
	□ C	o conversion factor onversion factor fro ite specific conversi	m rules	,		, j.	
Recycling							
	al Recycled recycled should	l: 0 d not be included in dispose	ed tons repo	orted. Report compo	st on separate form. C		ubic Yds. yards)
Utah Disposal	Fee						
Dispos	al Fee Req	uired to be Paid to S	State	Yes	□ No 🗷		
Fee	Paid	Municipal Industrial	<u>\$</u> \$	N/A N/A	_ C/D _ Annual	<u>\$</u> \$	N/A N/A
Landfill Capa	city						
Curren	Tons:	Remaining Capacity			ic Yards: es:		
Financial Assu	rance						
Current Closure Cost Estimate: \$98,411 Current Post-Closure Cost Estimate: \$21,850 Current Amount or Balance in Mechanism: \$120,658.19 (If balance does not equal or exceed total for closure and post-closure care please contact the Division) Current Financial Assurance Mechanism: Trust Fund (ie. Bond, Trust Fund, Corporate or government Test etc.) Mechanism Holder and Account Number: Intermountain Power Agency (ie. Name of Bond Company, Bank etc. Account number) Financial Assurance: Each facility must recalculate the cost of closure and post-closure care to account for inflation and design changes each year. The inflation factor can be found on the Division web page. Facilities that are using a trust account should include a copy of the most recent account statement. Note Facilities using "Local Government Financial Test" or the "Corporate Financial Test" must provide the information required in R315-309-8(4) or R315-309-9(3) each year.							
Other Require		· · · · · · · · · · · · · · · · · · ·			·		
St	Explosive C	ter Monitoring: Class I as Monitoring: Class I, port: A report of all train	II and V la	andfills only. Checams or procedures	ck if <u>exempt</u>	y personne	l during the year.
Signature: Date: Date: Signature should be an executive office, general partner, proprietor, elected official, or duly authorized representative must meet the requirement of the solid waste rules (UAC R315-310-2(4)(d)).							
Print Name: <u>(</u>	George W. (Cross		Title: Pres	ident & Chief O	<u>perations</u>	Officer

Cost Estimate for Closure of the Sanitary Landfill

With the recent changes in Industrial Landfill regulations (R315-304) Class IIIb landfills are now required to provide financial assurance for closing costs. Intermountian Power Service Corp. has a Class IIIb industrial landfill located at the Intermountian Generating Station in Delta Utah. The landfill is located in Township 15 south, Range 7 West, NW 1/4 of Section 13 and covers about 47.5 acres.

Closure of a Class IIIb landfill is required to meet specifications of R315-305-5(5)(b). The following items and their estimated cost are listed below as required in the above regulations.

• Having equipment level the waste to extent possible. This would be covering any open trench excavated and still open and removing any loose refuse in the landfill area to the trench before coverage. The maximum trench exposed at any one time is approximately 300 feet

Removing any loose refuse to the trench; 24 hr at \$38.50/hr = \$924.00Covering the trench (8000 cu. yards) 24 hr at \$190.20/hr = \$4565.00

• Covering the waste with 2 feet of soil, contouring the cover and preparing the area for seeding. Hauling in up to 21,000 cubic yards of soil to contour and place soil for vegetation.

Scraper hauling 262 yards per hour for 80 hours @ \$700.30/hr; \$56,024.00

• Seeding, mulching and(fertilizing as needed)the area with native grass and/or shrubs:

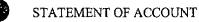
Seeding the whole landfill area (48.8 disturbed acres); \$756.10/acre =\$36,898.00

• Total cost estimate is \$98,411.00

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This landfill accepts only nonhazardous industrial refuse generated on site, no municipal waste. as per R315-303-3(5)(e), thus no gas monitoring is required. Class IIIb landfills do not require any ground water monitoring as per R315-304-5(4)(c). There will be no post cost incurred from these items.

This is the estimate submitted for the 2008 Solid Waste Landfill Annual Report.







PUBLIC TREASURERS' INVESTMENT FUND

Edward T. Alter, Utah State Treasurer, Fund Manager PO BOX 142315

Salt Lake City, Utah 84114-2315 Local Call (801) 538-1042 Toll Free (800) 395-7665 www.treasurer.utah.gov

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ESCROW-INTERMOUNTAIN POWER AG

ATTN: JIM HEWLETT

10653 S RIVER FRONT PKWY STE 120

SO JORDAN UT 84095

STATEMENT OF ACCOUNT NO: 6107

REPORT PERIOD: 02/01/08 TO 02/29/08

DATE	REFERENCE	DEPOSITS	WITHDRAWALS	BALANCE
	~			
02/01/08	BEGBAL	0.00	0.00	120,249.75
02/29/08	NETEARN	408.44	0.00	120,658.19
02/29/08	ENDBAL	0.00	0.00	120,658.19

ACCOUNT SUMMARY

NET EARNINGS RATE:

BEGINNING BALANCE:	120,249.75
DEPOSITS IN THE PERIOD:	408.44
WITHDRAWALS IN THE PERIOD:	0.00
ENDING BALANCE:	120,658.19
GROSS EARNINGS:	408.44
ADMINISTRATIVE FEE (0.0000%)	0.00
NET EARNINGS:	408.44
AVERAGE DAILY BALANCE:	120,249.75
GROSS EARNINGS RATE: 4.2164%	

4.2164%

+ EQUIVALENT 365 DAY RATE IS +

4.2750% +

LESSON PLAN FOR TRAINING ON IPSC'S LANDFILL PERMITS:

IPSC has two different permitted landfills, the Sanitary Landfill and the Combustion By-Products Landfill. Both of these landfills are regulated by the State Division of Solid and Hazardous Wastes. IPSC's current landfill permits were issued in February of 2007 and run through 2017. As part of the permit conditions, IPSC is required to have a Plan of Operation for each landfill permit. IPSC's Plan of Operation consists of the landfill permit applications, the permits, and the records. These records are kept by the Environmental Group in the administration building.

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SANITARY LANDFILL

Wastes Allowed in the Sanitary Landfill (landfill):

- Misc. Wastes such as concrete, asphalt, glass, plaster, rubber, steel, wood, paper, plastic, grass clippings, wastepaper, lunchroom trash, etc. may be placed in the landfill.
- Some wastes such as large shipping crates, mini-bins (which must be empty), furniture need to be crushed prior to placement in the landfill.
- Empty plastic 55 gallon drums which have been crushed may be placed in the sanitary landfill. Metal 55 gallon drums should be crushed and placed in the metal recycle bin.
- Small quantities of medical waste from the First Aid Station may be landfilled, but must be buried and covered immediately when placed in the landfill.
- Misc. Sand and dirt with the digested wastewater sludge from the sewage treatment plant
 may be placed in the landfill. However, it must be dried to remove any free liquid prior
 to being placed in the landfill.
- Asbestos containing material may be placed in the section of the landfill set aside for this.

Wastes NOT Allowed in the Sanitary Landfill (landfill):

- Hazardous wastes as defined by hazardous waste rules (paint solvents, heavy metals, etc.)
- Any container of liquid greater than 5 gallons.
- Any material which contains free liquid. The oil sorbent mats do not contain free liquid so it is ok to put them in the landfill.
- Any wastes that would be brought from offsite source (households, municipal, commercial).

Landfill Operation for the Sanitary Landfill (landfill):

- The operations plan shall be kept onsite (at the Administration Building by the Environmental Group).
- The landfill shall continue to be operated so that unauthorized entry to the landfill is prevented.
- All loads are to be visually inspected by the FEO's to verify that only approved wastes are being placed in the landfill. In addition, a complete waste inspection shall be conducted

at a minimum frequency of 1% of the loads received. This complete inspection is typically done by the FEO Supervisor and is documented on the back of the operational log. It is estimated that 6 to 12 dumpsters per year would be about 1% of the loads received.

- At the end of each landfill operating day, the FEO's are to determine if the landfill needs covering, and if it does apply the cover and record how much cover was applied (6-inch minimum). The wastes should be covered as necessary to prevent fires, control vectors (rodents, birds, etc.), blowing litter, odor, scavenging, and fugitive dust. The landfill is to be covered no less than once each month, and more often if needed.
- Disposal of non-containerized material containing free liquids or any waste containing free liquids in containers larger than five gallons is prohibited.
- The landfill roads shall be maintained as necessary to assure safe and reliable all-weather access to the disposal area.
- The wastes need to be managed to prevent fires and minimize fugitive dust.
- The record of landfill operations must be kept on file, and includes the number of loads of waste and the weights or estimates of weights or volume of waste received each day of operation and recorded at the end of each landfill operating day; major deviations from the approved plan of operation must be recorded at the end of each landfill operating day the deviation occurred; results of other monitoring, records of all inspections. A daily operational log for the landfill is to be filled out each day operations are conducted at the landfill. The FEO's and/or their Supervisor are responsible for filling out this operational log. The operational log shall include the date, weight, and person taking each dumpster load to the landfill.
- The general record of landfill operations shall include a copy of the permit and application, results of any inspections, closure and post-closure plans, and training records.
- An annual report must be submitted to the State, Environmental prepares this report.
- The landfill operation, permit, and so on should be inspected at least quarterly,

General Requirements for Sanitary Landfill (landfill):

- A small berm should be constructed on the open side of the cell to prevent any water from running into the open cell. This small berm also helps act as a stop for the truck tires backing up to the cell to empty loads.
- The orientation and size of the cells are to be constructed the same as shown on the application turned into the State.
- Wastes from the plant site should only be taken to the landfill by the FEO's, not other
 plant personnel. All plant wastes are to be put in the dumpsters that are placed around the
 site. The FEO's are the only people that are to take waste directly to the landfill without
 prior permission.
- The FEO's need to verify that the dumpsters do not contain sludge, ash, or contaminated coal. If they do, they need to be taken to the Combustion By-Products landfill.
- When a cell is finished, a minimum of 2 feet of soil is to be placed over the top layer of